

EXHIBIT B

(Exhibit has been redacted to protect
confidential information)

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Civil Action No. 4:20-CV-957-SDJ

**DECLARATION OF BRYCE L. CALLAHAN IN SUPPORT OF
DEFENDANT’S MOTION TO TRANSFER VENUE**

I, Bryce L. Callahan, declare as follows:

1. I am a partner in the law firm Yetter Coleman LLP, counsel to Defendant Google LLC (“Google”) in the above-captioned litigation. I am licensed to practice by the State of Texas.

2. I provide this declaration in support of Google’s motion to transfer venue. This declaration is based on my personal knowledge and investigation.

3. I have reviewed the “September 2018 Google-Facebook agreement” referenced in paragraph 183 of the Complaint in the above-captioned litigation. [REDACTED]

[REDACTED]

[REDACTED].

4. Based on publicly available data, I have determined that the Northern District of California has an estimated population of 8.4 million.¹

¹ See <https://worldpopulationreview.com/us-counties/states/ca> (reporting California population by county); <https://www.cand.uscourts.gov/about/jurisdiction-map/> (identifying counties comprising Northern District of California).

5. Attached as Exhibit B1 hereto is [REDACTED]

6. Attached as Exhibit B2 hereto is [REDACTED]

7. Attached as Exhibit B3 hereto is a true and correct copy of Amy Miller & Michael Acton, *Publishers Can File Separate Claims Alleging Google Monopolizes Digital Ad Markets, Judge Says*, mLex Market Insight (Feb. 4, 2021).

8. Attached as Exhibit B4 hereto is a true and correct copy of Jack Karp, *Meet The Attorneys Helping Texas Take On Google*, Law360 Pulse (Feb. 1, 2021).

9. Attached as Exhibit B5 hereto is a true and correct copy of a Class Action Complaint filed against Google on January 29, 2021 in the Northern District of California, *JLASALLE Enterprises LLC v. Google LLC*, No. 5:21-cv-00748 (N.D. Cal.).

10. Attached as Exhibit B6 hereto is a Class Action Complaint filed against Google on February 1, 2021 in the Northern District of California, *Negron v. Google LLC*, No. 4:21-cv-00801 (N.D. Cal.).

11. Attached as Exhibit B7 hereto is a true and correct copy of a Class Action Complaint filed against Google on February 2, 2021 in the Northern District of California, *Mikula Web Solutions, Inc. v. Google LLC*, No. 5:21-cv-00810 (N.D. Cal.).

12. Attached as Exhibit B8 hereto is a true and correct copy of a Complaint filed against Google and Facebook, Inc. on January 29, 2021 in the Southern District of West Virginia, *HD Media Company, LLC v Google*, No. 3:21-cv-00077 (S.D.W. Va.).

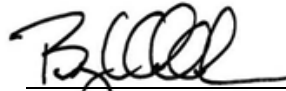
13. Attached as Exhibit B9 hereto is a true and correct copy of the Transfer Order *In re: Google Antitrust Litigation*, MDL No. 2981, ECF No. 46 (J.P.M.L. Feb. 5, 2021).

14. Attached as Exhibit B10 hereto is a true and correct copy of the Order on Motions to Relate at ECF 55, 57, 61, 64 *In re Google Digital Advertising Antitrust Litigation*, No. 5:20-cv-03556, ECF No. 69 (N.D. Cal. Jan. 22, 2021).

15. Attached as Exhibit B11 hereto is a true and correct copy of the Related Case Order *In re Google Digital Advertising Antitrust Litigation*, No. 5:20-cv-03556, ECF No. 90 (N.D. Cal. Feb. 9, 2021).

16. Attached as Exhibit B12 hereto is a true and correct copy of Plaintiff's Notice of Intersted [sic] Party Kimberly Negron's Unopposed Administrative Motion to Consider Whether Negron v. Google LLC Should Be Related to Certain Google Litigation Pending Before Judge Freeman in *Negron v. Google LLC*, No. 4:21-cv-00801, ECF No. 14 (N.D. Cal. Feb. 9, 2021).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of February, 2021 in Houston, Texas.



Bryce L. Callahan